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July 15, 1977

The President
The White House
Washington, D. C. 20500

Dear Mr. President:

The purpose of this letter is to bring your attention to an apparent conflict between your policies and the practices of one of your agencies.

Specifically, it is regarding EPA Office of Toxic Substances' proposed regulations for handling and disposal of polychlorinated biphenyls (PCBs) published in the Federal Register on May 24, 1977. Attached is a copy of the comments we submitted.

We are concerned that these proposed regulations directly contradict your commitment to clear and concise federal regulations and wanted to bring this to your attention.

As our response to EPA indicates, Seattle City Light has been very concerned with the problem of PCBs and developed careful procedures for handling and disposal of this toxic substance when information regarding the extremely adverse effects of PCBs in the environment became widely known. We believe EPA's proposed regulations to be unnecessarily complex and confusing and that they will likely inhibit proper action.

As you have publicly stated regulations must be simplified but not in turn weakened if we are to maximize their effectiveness. Implementation is the key and standardizing the required dates for labeling of PCB-filled equipment is an example of possible ways to simplify the proposed regulations. We strongly urge your Administration to explore all possible methods to develop simple and effective controls.

Of equal concern is locating an environmentally acceptable alternative (non-PCB) fluid. Presently, an acceptable alternative has been identified for power transformers but there is some question as to a suitable non-PCB fluid for capacitors. Of utmost importance is preventing the introduction of a substitute compound into the environment which may be equally dangerous. Proper analysis prior to introduction is therefore essential. However, my staff has discussed this with the EPA Office of Toxic Substances (Washington, D. C.) which

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was hesitant to make any commitment to analyzing the proposed alternative fluids. EPA indicated that it would be at least December, 1977, (if at all) before their office examined this problem.

All of the PCBs still in service in the U. S. (with limited exceptions) are in electrical transformers and capacitors, and removing them from the system will require availability of a substitute fluid. We believe EPA should give high priority to analyzing the alternatives and making a recommendation to the utility industry. This would decrease the risk of introducing a fluid that may damage our environment further and would benefit our Nation as a whole.

We feel this is an excellent opportunity for your Administration to implement your commitment to clear and concise federal regulations and hope you will alter the proposed rules accordingly. In addition, we would hope you would be concerned along with us regarding prevention of a similar problem and would urge EPA Office of Toxic Substances to undertake an environmental analysis of the proposed non-PCB fluids for power capacitors immediately.

We in the industry appreciate your sensitivities to the impact of Federal Regulations on our operations. We wish your Administration the best of luck in your efforts.

Sincerely yours,

(Sgd.) Gordon Vickery

Gordon Vickery
Superintendent

MLO:ct
Attachment

cc: Charles Warren, Council on Environmental Quality
Douglas M. Costle, EPA Administrator
Donald P. Dubois, EPA Region X Administrator

bc: Mr. Dennis Stefani, EPA Region X Office of Toxic Substances
Mr. Jim Everts, EPA Region X Office of Toxic Substances
Mr. George Wirth, EPA, Office of Toxic Substances
Ms. Joni T. Repasch, EPA, Office of Toxic Substances
Ms. Marion Edy, Council on Environmental Quality

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